

PP

AMENDED COMPLAINT

(for filers who are prisoners without lawyers)

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

(Full name of plaintiff)

Darryl Edwards

v.

Case Number:

(Full name of defendant(s))

22-cv-1455-PP

(to be supplied by Clerk of Court)

Milwaukee County Jail + "Classification staff"

Milwaukee County Healthcare Wellpath

Jane Doe (morning, noon, late night nurses) June - Sept 2022 (Infirmery)

Jane Doe "Nurse Practitioner" 5th Floor

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Stanley Correctional Institution, 100 Corrections Dr.
(Address of prison or jail)

2. Defendant Milwaukee County Jail, Wellpath + Jane Doe
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

Amended Complaint - 1

and (if a person) resides at N / A
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee County Jail
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On my arrival to the Milwaukee County Jail on June 12th, 2022, in the booking room, Jane Doe "evening nurse" was very rude when I showed her my urine that turned into blood inside my Foley bag which she stated that I'll have to talk to the next shift nurse about my concern; without trying to offer no help at all, having an attitude because she didn't want to be at work to do her job im guessing. I spent 2 days in the booking room with 2 catheters in, very uncomfortable and in pain. "Milwaukee County classification" staff failed to have me in a secured place to avoid further injury, and infections.

- * "Milwaukee County Jail Classification staff" who failed to place me in a secured area to avoid further injury and infection when I arrived at the County Jail on June 12th 2022 with 2 catheters in me forcing me to lay on a hard bench and slab for 2 days.
- * Milwaukee County Jail's WellPath failed to keep up with my urine samples from October 5th, 2022 through November 4th 2022 which I still had an UTI when the results came back on November 10th 2022 putting me at Grave Risk harm.
- * It was Milwaukee County Jail's policy to give out generic antibiotics to inmates with infections

that didn't work from July - November having an ongoing UTI that possibly could've affected my blood, killing me.

* WellPath gave me the first antibiotic 4 days after I received notice of the infection from the hospital on Aug 6, 2022, Aug 10, 2022 I started the meds for 10 days. They collected a urine sample on Aug 26th 2022. August 30th 2022 the results was I still had the UTI. Wellpath gave a second pill the same day, I took it until Sept 9, 2022, they collected a urine sample on Sept 10th, 2022, on Sept 16, 2022 the results came back, I still had the UTI. That same day Jane Doe "noon nurse on the 5th floor" told me to take a third antibiotic for the

weekend so that the infection bacteria wouldn't affect my blood, but the sign affects your activities, so I had no other choice but to take the pill. Sept 19, 2022 my heels burned and my body was stiff and ached so bad I told the "noon nurse" Jane Doe on 5C Pod which she told me she took notes and would get back to me. I heard nothing back for hours so I called my attorney being desperate for help and ask him to ask the judge if I could receive an emergency release so that I could get the treatment I needed to get rid of the UTI because of the Milwaukee County Policy of giving me the wrong medication, but I was denied. Sept 23, 2022 I finished that antibiotic, received an urine sample on

October 5, 2022 and on Oct 31st 2022 I put in a pink & white slip because I haven't received my urine sample results yet, after asking nurse after nurse daily. Finally on Nov. 4th 2022 they came to give me another urine sample without the results from Oct. 5th 2022 sample results. Nov 10th, 2022 the clinic told me the UTI was still in my body and it gotten worst and I needed to see a specialist at the hospital which would take a week or two to be seen, so she put me on the fourth antibiotic which was a double dosage until I went to the hospital for the third time which was 4 days later. I finished that antibiotic after 10 days the infection finally cleared. The neglect on following up with the urine tests made me file a civil

rights suit. I shouldn't have had that infection for almost 5 months untreated and certain medication made it worst by the Milwaukee County Polycys to use generic antibiotics that don't work or help the inmates with these types of infections.

* Jane Doe's "morning, noon, evening nurses" from June 15th 2022 - Aug 5th 2022 never checked to make sure I was healing correctly from my gunshot injuries, not making sure no infections was there, only providing supplies so I could care for my own wounds. All nurses from the 3rd floor infirmary on those dates except for a morning nurse named Mrs. Brown which she was the only one to check me out on Aug. 6th 2022 and made sure I went to the hospital

* July 25th 2022 my catheter in my penis came out on its own due to the pressure build up and the catheter being in too long, I reported it to the "late night nurse" Jane Doe which she never checked me out to make sure nothing was damaged, she just said she'll take notes and give them to the jail doctor the next day and I was forced to urinate out of my damaged penis until I got an appointment to the hospital.

* Jane Doe "Nurse Practitioner" on the 5th floor had refused to give me her name as I kept complaining making me wait weeks and weeks to get my Oct 05th 2022 results back from the urine for the UTI and I didn't get results until Nov 10, 2022 and still had the infection.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff is different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like for some of the policies to change as far as inmates with injuries being properly cared for instead of being treated inhumane because of mistakes they've made to end up in jail. If the hospital prescribe medications that's not controlled substance meds and just antibiotics to cure infections the Milwaukee County Jail should be able to provide those medications, so that no other human being have to go months and months with an deadly infection uncured, because of their policy.

E. JURY DEMAND

I want a jury to hear my case.

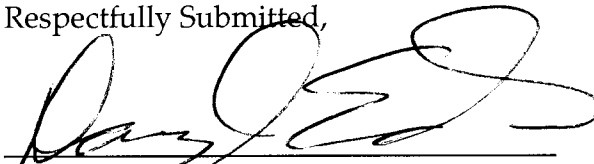
☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 21st day of August 2023.

Respectfully Submitted,



Signature of Plaintiff

513234

Plaintiff's Prisoner ID Number

100 Corrections Drive

Stanley, WI 54768-6500
(Mailing Address of Plaintiff)

Darryl Edwards #513234
Stanley Correctional Institution (3A-18)
100 Corrections Drive.
Stanley, WI 54768-6500



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Office of the Clerk
United States District Court
Eastern District of Wisconsin
362 United States Courthouse
517 E. Wisconsin Avenue
Milwaukee, WI 53202

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